

PX 252

Message

From: Antoinette O'Gorman [redacted]@ripple.com
on behalf of Antoinette O'Gorman [redacted]@ripple.com> [redacted]@ripple.com
Sent: 3/11/2017 3:32:05 PM
To: Brad Garlinghouse [Brad Garlinghouse [redacted]@ripple.com]>
Subject: Compliance Weekly Update as of 3/10/17

XRP/XRP II Highlights

Redacted

- Presented Compliance 2017 Focus at bi-weekly Leadership meeting on 3/8
- Completed XRP II BSA/AML Policy Variance and memo to file for recent [redacted] KRP transaction via XRP II.
- Drafted BSA Compliance "independence" presentation per your 3/10 request (via [redacted] presentation scheduled for 3/20).
- AO'G meeting with [redacted] on 3/15 to discuss Japan's virtual currency regulation and outcome of recent trip to Japan.

Reg Relations Highlights

- Completed for Clients and Regulators
 - BIS - survey response and 13 page paper on ILP and XRP submitted
 - Ryan Z confirmed as speaker at Asia Pacific Central Bank Conference, May 22-26
- Ryan Z External
 - Spoke at LendIt Conference (~250 attendees, blockchain for xborder payments)
 - Interview with [redacted] re: Ripple and Fed Faster Payments Initiative
 - Interview with [redacted] re: evolution of blockchain & Ripple update
- AO'G and Ryan Z met with [redacted] on 3/06 re: Ripple's position that XRP is not a security. Meeting went well; however, XRP certainly has some "securities-type" characteristics and we do need to hone our playbook / messaging
 - Next steps: Scheduling an "educational" meeting with XRP and MarComm teams this coming week on how to discuss XRP/RCL generally and in presentations, responses to inquiries, etc. (e.g., some language used in the XRP presentation at this week's bi-weekly meeting was not ideal).

Redacted

Hiring

- Compliance/Risk Manager position: Two phone screens this week and one onsite interview on Friday, 3/10 - too junior for this position. Meeting with Lending Club candidate on Monday, 3/14.
- Reg Relations Manager candidate (for Singapore/Sydney): To be discussed with [redacted] on Monday, 3/13.
- [redacted] replacement: Looking to elevate this to a higher level Reg Relations position. Proposed job description to be submitted week of 3/13/17.

Other

- Shoring up NYDFS cyber security requirements with [redacted]
- Responded to USAO-Arizona subpoenas (x 2) on 3/8.

- Received notification of new regulatory subpoena from NY attorney's office; details to be provided upon receipt.
- Working on [REDACTED] question re: requirements/obligations for acting as a Ripple validator. Also reviewing existing and proposed Ripple validators in terms of optimal locations (for least compliance impact/obligation to Ripple).
- Working on [REDACTED] IoV proposal; targeting completion of IoV proposal by 3/17/17. Also in broader [REDACTED] discussions with [REDACTED] and [REDACTED]
- Working with Product on GPSG requirements/Ripple Network rulebook.

Chief Compliance Officer | Ripple

[REDACTED] @ripple.com | ripple.com

